

#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 19 2000

#### **MEMORANDUM**

TO:

LAWRENCE M. NOBLE

GENERAL COUNSEL

THROUGH:

JAMES A. PEHRKON

STAFF DIRECTOR

FROM:

JOHN D. GIBSONO

ASSISTANT STAFF DIRECTOR REPORTS ANALYSIS DIVISION

SUBJECT:

REFERRAL OF THE ARAB AMERICAN LEADERSHIP POLITICAL

ACTION COMMITTEE

This is a referral of the Arab American Leadership Political Action Committee ("the Committee") for failure to file the 1998 July Quarterly and 1998 Year End Reports within thirty (30) calendar days from the date of the Non-Filer Notice. According to the 1997-1998 RAD Review and Referral Procedures for Unauthorized Committees further examination is required by your office.

The Committee was referred on September 30, 1999 for a possible 2 U.S.C. 438(b) audit covering the 1997-1998 election cycle. The Commission voted on October 19, 1999 not to audit the Committee (see RAD Referral #A99-77). Please note that the Committee met the priority review threshold with the filing of its 1998 October Quarterly Report.

If you have any questions regarding this matter, please contact Debbie Chacona at 694-1130.

Attachment

#### REPORTS ANALYSIS REFERRAL

TO

#### OFFICE OF GENERAL COUNSEL

DATE: January 19 2000

ANALYST: Debbie Chacona

I. COMMITTEE:

Arab American Leadership Political Action Committee

(C00194225)

James Joseph Zogby, Treasurer

918 Sixteenth Street NW

Suite 501

Washington, D.C. 20006\*

II. RELEVANT STATUTE: 2 U.S.C. \$434(a)(4)(A)(i)

11 CFR §104.5(c)(1)(i)(A)

#### III. BACKGROUND:

Failure to Timely File the 1998 July Quarterly and 1998 Year End Reports

The Arab American Leadership PAC ("the Committee") failed to timely file the 1998 July Quarterly and 1998 Year End Reports of Receipts and Disbursements covering the periods from April 1, 1998 to June 30, 1998 and November 24, 1998 to December 31, 1998, respectively.

On December 29, 1997 and June 19, 1998 Prior Notices were sent to the Committee informing it that the 1998 July Quarterly Report was due on July 15, 1998 (Attachments 2 & 3).

A Non-Filer Notice was sent to the Committee via mailgram on December 28, 1998 referencing the 1998 July Quarterly Report (Attachment 4).

On December 29, 1997 and December 30, 1998, Prior Notices were sent to the Committee informing it that the 1998 Year End Report was due on January 31, 1999 (Attachments 2 & 5).

<sup>\*</sup>All of the reports and amendments received on November 18, 1999 reflect an address of 1600 K Street, NW, Suite 501, Washington, D.C. 20006; however, no official request for an address change has been received.

## ARAB AMERICAN LEADERSHIP POLITICAL ACTION COMMITTEE REPORTS ANALYSIS OGC REFERRAL PAGE 2

On February 8, 1999, the Committee filed a 1998 Amended Year End Report; yet, no original 1998 Year End Report was submitted (Attachment 6).

On April 7, 1999, a Request for Additional Information ("RFAI") was sent to the Committee. The RFAI stated that the Commission had not received the Committee's original 1998 Year End filing, and advised the Committee that its report would not be considered complete until a Detailed Summary Page and all appropriate supporting schedules for the 11/24/98-12/31/98 period had been filed (Attachment 7).

On September 22, 1999, the Reports Analysis Division ("RAD") analyst called Ethel Ellis, the bookkeeper for the Committee, and told her that the Commission had not received the 1998 July Quarterly, 1998 Year End and 1999 reports, and that the matter may be referred to the Office of General Counsel. Ms. Ellis stated that she was working on amending all of the reports and was waiting to send in the missing reports since all of the figures would change as a result of the amendments. The analyst advised Ms. Ellis to send in the missing reports as soon as possible and to amend at a later date if necessary. Ms. Ellis said she would send the missing reports the next day (Attachment 8).

On November 3, 1999, the RAD analyst called Ms. Ellis and told her that the Commission had still not received the 1998 July Quarterly, 1998 Year End and 1999 reports, and again stated that this matter may be referred to the Office of General Counsel. Ms. Ellis stated that she was busy with other work responsibilities, but would come to the Commission on Monday, November 8, 1999 with the missing reports and amendments (Attachment 9).

On November 10, 1999, the RAD analyst called Ms. Ellis and told her that the Commission had still not received the 1998 July Quarterly, 1998 Year End and 1999 reports, and reiterated that this matter may be referred to the Office of General Counsel. Ms. Ellis stated that she would definitely come to the Commission on Monday, November 15, 1999 to meet with the analyst. She said that she had questions that needed to be answered before she could complete the missing reports. Ms. Ellis and the analyst agreed to meet on Monday, November 15, 1999 at 10:30 am (Attachment 10).

On November 15, 1999, the RAD analyst met with Ms. Ellis. She stated that she was working on the past due 1998 July Quarterly Report and discovered that the previous bookkeeper disclosed the activity for that period in the 1998

<sup>&</sup>lt;sup>1</sup> Because the report was added to the Commission's database as a new rather than amended report, the Committee did not appear as a nonfiler on the Year End nonfiler run.

# ARAB AMERICAN LEADERSHIP POLITICAL ACTION COMMITTEE REPORTS ANALYSIS OGC REFERRAL PAGE 3

October Quarterly reporting period. She said that she was in the process of putting together the 1998 July Quarterly Report and would have it completed by Thursday. In addition, Ms. Ellis stated that the Committee had already filed the 1998 Year End Report and she showed a copy of this report to the RAD analyst. The RAD analyst informed her that the Commission never received this original filing, but did receive two amended 1998 Year End filings. Ms. Ellis gave the analyst a copy of the 1998 Year End Report and the analyst put it on the public record. Ms. Ellis stated that she would be filing amended reports along with the 1998 July Quarterly and 1999 reports on Thursday of this week (Attachment 11).

On November 18, 1999, the Committee filed the 1998 July Quarterly Report, the 1999 Mid-Year Report, and several amendments for calendar year 1998 reporting periods (Attachment 12).

achment #1 e 1 of 3

DATE 1/14/2000

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS		# OF	IMAGE
				COVERAGE DATES	PAGES	LOCATION
				TYPE	OF FILER	}

	MERICAN LEADERSHIP POLITICAL ACTION COMMI	TTEE		ID #C00194225 NON-	PARTY QUALIFIED
	ORGANIZATION: N/A				
1991	7 MID-YEAR REPORT	0	250	1JAN97 -30JUN97	5 97FEC/237/0023
	NOTICE OF FAILURE TO FILE			1JAN97 -30JUN97	2 97FEC/236/2108
	REQUEST FOR ADDITIONAL INFORMATION			1JAN97 -30JUN97	1 98FEC/341/3707
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN97 -30JUN97	2 98FEC/347/2616
	YEAR-END	-	932	1JUL97 -31DEC97	5 98FEC/280/2591
	REQUEST FOR ADDITIONAL INFORMATION			1JUL97 -31DEC97	2 98FEC/341/3708
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL97 -31DEC97	2 98FEC/347/2618
199	B APRIL QUARTERLY	3,000	1,750	1JAN98 -31MAR98	6 98FEC/306/4443
	APRIL QUARTERLY - AMENDMENT	3,000	1,750	1JAN98 -31MAR98	2 99FEC/431/3863
N. 5	APRIL QUARTERLY - AMENDMENT	3,000	1,750	1JAN98 -31MAR98	3 99FEC/446/3074
14.4*	APRIL QUARTERLY - AMENDMENT	3,000	1,750	11JAN98 ~31MAR98	3 99FEC/456/0149
·	REQUEST FOR ADDITIONAL INFORMATION			1JAN98 -31MAR98	3 98FEC/341/3662
error Super	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN98 -31MAR98	4 98FEC/347/2620
761	REQUEST FOR ADDITIONAL INFORMATION			1JAN98 -31MAR98	2 99FEC/440/4564
1	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN98 -31MAR98	2 99FEC/446/2870
	REQUEST FOR ADDITIONAL INFORMATION			1JAN98 -31MAR98	2 99FEC/448/2793
fu	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN98 -31MAR98	2 99FEC/451/1984
÷	JULY QUARTERLY	22,791	13,500	1APR98 -30JUN98	7 99FEC/491/2677
	NOTICE OF FAILURE TO FILE			1APR98 -30JUN98	2 99FEC/414/3778
	OCTOBER QUARTERLY	55,015	50,343	1JUL98 -30SEP98	15 98FEC/375/0818
•	OCTOBER QUARTERLY - AMENDMENT	•	· · ·	1JUL98 -30SEP98	2 98FEC/412/4684
3	OCTOBER QUARTERLY - AMENDMENT	55,015	50,343	1JUL98 -30SEP98	15 99FEC/431/3865
	OCTOBER QUARTERLY - AMENDMENT	55,015	50,343	1JUL98 -30SEP98	7 99FEC/446/3077
2.2	OCTOBER QUARTERLY - AMENDMENT	51,300	50,343	1JUL98 -30SEP98	4 99FEC/456/0152
÷	OCTOBER QUARTERLY - AMENDMENT	52,565	50,343	1JUL98 -30SEP98	3 99FEC/491/2684
5.T.	REQUEST FOR ADDITIONAL INFORMATION	02,000	20,110	1JUL98 -30SEP98	4 98FEC/412/0801
5. 6.1 1.4	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL98 -30SEP98	3 99FEC/415/2151
i ta	REQUEST FOR ADDITIONAL INFORMATION			1JUL98 -30SEP98	5 99FEC/440/4559
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL98 -30SEP98	5 99FEC/446/2872
	REQUEST FOR ADDITIONAL INFORMATION			1JUL98 -30SEP98	2 99FEC/448/2789
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL98 -30SEP98	2 99FEC/451/1986
	REQUEST FOR ADDITIONAL INFORMATION			1JUL98 -30SEP98	2 99FEC/476/1099
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL98 -30SEP98	3 99FEC/479/2191
	PRE-GENERAL	9,115	0	10CT98 -140CT98	4 98FEC/384/3877
	PRE-GENERAL - AMENDMENT	9,115	0	10CT98 -140CT98	2 99FEC/456/0156
	PRE-GENERAL - AMENDMENT	7,115	0	10CT98 -140CT98	3 99FEC/491/2687
	POST-GENERAL	38,669	31,844	150CT98 -23NOV98	12 98FEC/401/2135
	POST-GENERAL - AMENDMENT	38.669	31,844	150CT98 -23NOV98	8 99FEC/446/3084
	POST-GENERAL - AMENDMENT	38.669	31,844	150CT98 -23NOV98	3 99FEC/456/0158

#### All Reports Have Been Reviewed

\$19 248 33 Cash-on-Hand as of 12/31/98:

\$0 00 Debts Owed to the Committee: Debts Owed by the Committee:

FEDERAL ELECTION COMMISSION
1997-1998
EE INDEX OF DISCLOSURE DOCUMENTS - (C)

A schment #1 e 2 of 3 DATE 1/14/2000

PAGE 2

COMMITTEE	DOCUMENT		RECEIPTS	[	DISBURSEMENTS	COVERAGE DATES TYP	# OF PAGES E OF FILE	IMAGE LOCATION R
					• • • • • • • • • • • • • • • • • • • •			
	POST-GENERAL	- AMENDMENT	38.669	33	.844	150CT98 -23NOV98	3 99Fi	EC/491/2690
	REQUEST FOR ADDITIONAL	INFORMATION	·			150CT98 -23NOV98	4 99FE	EC/440/4555
	REQUEST FOR ADDITIONAL	INFORMATION 2ND				150CT98 -23NOV98	5 99FE	EC/446/2877
	REQUEST FOR ADDITIONAL	INFORMATION				150CT98 -23NOV98	2 99FE	EC/448/2791
	REQUEST FOR ADDITIONAL	INFORMATION 2ND				150CT98 -23NOV98	3 99FE	EC/451/1988
	YEAR-END	- AMENDMENT	150	6.	500	24NOV98 -31DEC98	5 99FE	C/431/3858
	YEAR-END	- AMENDMENT	150		500	24NOV98 -31DEC98	4 99FE	C/456/0161
	YEAR-END	- AMENDMENT	150		.500	24NOV98 -31DEC98		C/490/5128
	YEAR-END	- AMENDMENT	150		.500	24NOV98 -31DEC98	3 99FE	C/491/2693
	REQUEST FOR ADDITIONAL	INFORMATION		Ψ,	,	24NDV98 -31DEC98		C/442/0237
	REQUEST FOR ADDITIONAL					24NOV98 -31DEC98		C/447/2173
1999	9 MISCELLANEOUS NOTICE FF					15MAR99	2 99FE	C/437/3868
95 84	TOTAL		124,290	0 107,	,119	0	201 <b>TO</b> 7	TAL PAGES

FEDERAL ELECTION COMMISSION
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COMMITTEE DOCUMENT RECEIPTS DISBURSEMENTS # OF IMAGE
COVERAGE DATES PAGES LOCATION
TYPE OF FILER

ARAB AMERICAN LEADERSHIP POLITICAL ACTION COMMITTEE ID #C00194225 NON-PARTY QUALIFIED CONNECTED ORGANIZATION: N/A 1999 MID-YEAR REPORT 165 6,356 1JAN99 -30JUN99 5 99FEC/491/2696 NOTICE OF FAILURE TO FILE 1JAN99 -30JUN99 2 99FEC/479/3436 TOTAL 165 0 6,356 0 7 TOTAL PAGES

All Reports Have Been Reviewed

Cash-on-Hand as of 6/30/99: \$13 057 16

Debts Owed to the Committee: \$0.00 Debts Owed by the Committee: \$856.50



tachment #2 Page 1 of 2

## REPORT NOTICE

#### FEDERAL ELECTION COMMISSION

#### PARTIES AND PACS

December 29, 1997

#### WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 1998.

I. Semi-annual Fil	ers		
REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98
II. Monthly Filers			
REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

#### LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

#### **COMPLIANCE**

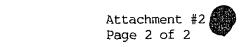
Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

#### **ELECTRONIC FILING**

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

<sup>\*</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>\*\*</sup> Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.



#### 1998 FILING SCHEDULE

I. QUARTERLY FILERS

		REG./CERT.	
		MAILING	FILING
REPORT	REPORTING PERIOD*	DATE**	DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

#### II. MONTHLY FILERS

		REG./CERT.	
		MAILING	FILING
REPORT	REPORTING PERIOD*	DATE**	DATE
February	01/01/98 - 01/31/98	02/20/98	02/20/98
March	02/01/98 - 02/28/98	03/20/98	03/20/98
April	03/01/98 - 03/31/98	04/20/98	04/20/98
May	04/01/98 - 04/30/98	05/20/98	05/20/98
June	05/01/98 - 05/31/98	06/20/98	06/20/98
July	06/01/98 - 06/30/98	07/20/98	07/20/98
August	07/01/98 - 07/31/98	08/20/98	08/20/98
September	08/01/98 - 08/31/98	09/20/98	09/20/98
October	09/01/98 - 09/30/98	10/20/98	10/20/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

#### 24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

<sup>\*</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>\*\*</sup> Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

# QUARTERLY REPORT NOTICE

#### FEDERAL ELECTION COMMISSION

#### PARTIES AND PACS

June 19, 1998

#### WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in July.

		REG./CERT.	
DUDODE	DEDODMING DEDIONA	MAILING	FILING
REPORT	REPORTING PERIOD*	DATE**	DATE
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98

#### 24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

#### PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1998 Record.

#### LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

<sup>\*</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>\*\*</sup> Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.



#### July Quarterly

#### **CHANGE IN FILING FREQUENCY**

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

#### **ELECTRONIC FILING**

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

#### **COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

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CCM 175 Attachment#4

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF MATLGRAM TO: JAMES JOSEPH ZOGBY

> ARAB AMERICAN LEADERSHIP PAC 918 SIXTEENTH ST, NW, SUITE 501 HASHINGTON DC 20006

FEDERAL ELECTION COMMISSION SHAWN WERTH \_ 999 E ST. NW. WASHINGTON DC 204630001

DECEMBER 38, 1998

IDENTIFICATION NUMBER: C00194225

REFERENCE: JULY QUARTERLY (C4/01/1998 - 06/30/1998)

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DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT. AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, Nowe, WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

ALTHOUGH THE COMMISSION MAY INITIATE AN AUDIT OR LEGAL ENFORCEMENT ACTION CONCERNING THIS MATTER, YOUR PROMPT RESPONSE AND A LETTER OF EXPLANATION HILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE TANY QUESTIONS REGARDING THIS MATTER, PLEASET CONTACT DEBBIE CHACONA ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS 12021694-1130.

SINCERELY.

JOHN D. SIBSON ASSISTANT STAFF DIRECTOR REPORTS ANALYSIS DIVISION

## YEAR-END

## REPORT NOTICE

#### FEDERAL ELECTION COMMISSION

#### PARTIES AND PACS

December 30, 1998

#### WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report.

#### **QUARTERLY AND MONTHLY FILERS**

		REG./CERT.	
		MAILING	FILING
REPORT	REPORTING PERIOD*	DATE**	DATE
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

#### LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

#### **CHANGE IN FILING FREQUENCY**

Committees wishing to change their reporting schedule (for example, from monthly to quarterly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

#### **ELECTRONIC FILING**

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#### **COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

<sup>\*</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>\*\*</sup> Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

### I. SEMIANNUAL FILERS

MAILING	FILING
DATE**	DATE
07/31/99	07/31/99
01/31/00	01/31/00
	07/31/99

#### II. MONTHLY FILERS

		REG./CERT.	
		<b>MAILING</b>	FILING
REPORT	REPORTING PERIOD*	DATE**	DATE
February	01/01/99 - 01/31/99	02/20/99	02/20/99
March	02/01/99 - 02/28/99	03/20/99	03/20/99
April	03/01/99 - 03/31/99	04/20/99	04/20/99
May	04/01/99 - 04/30/99	05/20/99	05/20/99
June	05/01/99 - 05/31/99	06/20/99	06/20/99
July	06/01/99 - 06/30/99	07/20/99	07/20/99
August	07/01/99 - 07/31/99	08/20/99	08/20/99
September	08/01/99 - 08/31/99	09/20/99	09/20/99
October	09/01/99 - 09/30/99	10/20/99	10/20/99
November	10/01/99 - 10/31/99	11/20/99	11/20/99
December	11/01/99 - 11/30/99	12/20/99	12/20/99
Year-End	12/01/99 - 12/31/99	01/31/00	01/31/00

<sup>\*</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>\*\*</sup> Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

This amondment is being filed due to a typed error we discovered in line 6c-column B.

4313861 HEPURT OF RECEIPTS A		PEMIFIAI		Λ.	tachment #6
For Other Than An Authorized Immittee (Summary Page)	<b>.</b>			Pá	age 2 of 2 DEIYED
급 NAME OF COMMITTEE (in full)	<del></del>		7 (	FEDERA	L ELECTION OH MAIL ROOM
ARAB AMERICAN LEADERSHIP	PAC		ľ	CHAIGCH	ich trecië ileari
ARAB AMERICAN LEADERSHIP  ADDRESS (number and street) Check  THE STREET, NW, SUIT	ck if different than previous	ly reported	1 .	EB B	12 4e PN 199
918 16TH STREET, NW, SUIT	re 601		2. FEC IDENT		
O CITY, STATE and ZIP CODE			COO194	1225	
ARAB AMERICAN LEADERSHIP  ADDRESS (number and street) Check  ON THE STATE and 21P CODE  WASHINGTON, DC 20006			· —		qualified as a multicand EC FOAM 1M)
4. TYPE OF REPORT					
(a) April 15 Quarterly Report		Monthly	y Report Oue On	:	
July 15 Quarterly Report		☐ Ma	ibruary 20 📋 arch 20 📋	July 20	Cotober 20 November 2
October 15 Quarterly Report			iril 20 🔲 ay 20 🔲	August 20 Septembe	/
January 31 Year End Report		12-Day	Pre-Election Rep	part for the_	(Type of Election)
July 31 Mid Year Report (Non-election Y	rear Only)	election	on	in ti	ne State of
		30-Day	Post-Election Re	epart fallow	ing the General Elec
Termination Report	/ _				ing the General Elec
(b) Is this Report an Amendment?	YES NO	on	in t	the State of	COLUMN B
(b) Is this Report an Amendment?  SUMMARY  5. Covering Period NOV 24, 198 thro	ough DEC.31, 19	on	in (	care of	COLUMN 8 alendar Year-to-Date
(b) Is this Report an Amendment?	ough DEC.31, 19	on	COLUMN A	care of	COLUMN B
(b) Is this Report an Amendment?  SUMMARY  5. Covering Period NOV 24, 198 thro	ough DEC.31, 19	98 521,	in t	the State of	COLUMN B alendar Year-to-Date
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## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

RQ-2

James Joseph Zogby, Treasurer Arab American Leadership Political Action Committee 918 16th Street, NW, Suite 501 Washington, DC 20006

APR 7 1999

Identification Number:

C00194225

Reference:

Year End Report (11/24/98-12/31/98)

Dear Mr. Zogby:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your cover letter states that you are filing an amendment to your Year End Report due to an error; however, the Commission has not received your original Year End Report. Please be advised that your report will not be considered complete unless you file a Detailed Summary Page and all of the appropriate supporting schedules for the 11/24/98-12/31/98 period.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Orbbie A. Charena

Debbie A. Chacona Senior Reports Analyst Reports Analysis Division

#### **TELECON**

DATE:

September 22, 1999

ANALYST:

Debbie Chacona

COMMITTEE:

Arab American Leadership PAC

The RAD analyst called Ethel Ellis, the bookkeeper for the Committee and told her that the Commission had not received the 1998 July Quarterly, 1998 Year End and 1999 Mid-Year Reports and that the matter may be referred to the Office of General Counsel. Ms. Ellis stated that she was working on amending all of the reports and was waiting to send in the missing reports since all of the figures will change as a result of the amendments. The analyst advised Ms. Ellis to sent in the missing reports as soon as possible and to amend at a later date if necessary. Ms. Ellis said she would send the missing reports tomorrow.

#### **TELECON**

DATE:

November 3, 1999

ANALYST:

Debbie Chacona

COMMITTEE:

Arab American Leadership PAC

The RAD analyst called Ethel, the bookkeeper for the Committee, and told her that the Commission had still not received the 1998 July Quarterly, 1998 Year End and 1999 Mid-Year Reports, and stated that this matter may be referred to the Office of General Counsel. Ethel stated that she was busy with other work responsibilities, but would come to the Commission on Monday, November 8, 1999 with the missing reports and amendments.

#### TELECON

DATE:

November 10, 1999

ANALYST:

Debbie Chacona

COMMITTEE:

Arab American Leadership PAC

The RAD analyst called Ethel, the bookkeeper for the Committee, and told her that the Commission had still not received the 1998 July Quarterly, 1998 Year End and 1999 Mid-Year Reports, and stated that this matter may be referred to the Office of General Counsel. Ethel stated that she would definitely come to the Commission on Monday, November 15, 1999 to meet with the analyst. She said that she had questions that needed to be answered before she could complete the missing reports. Ethel and the analyst agreed to meet on Monday, November 15, 1999 at 10:30 am.

#### **MEETING**

DATE:

November 15, 1999

ANALYST:

Debbie Chacona

COMMITTEE:

Arab American Leadership PAC

MEETING WITH:

Ethel Ellis

The RAD analyst met with Ms. Ellis, the bookkeeper for the Committee. She stated that she was working on the past due 1998 July Quarterly Report and discovered that the previous bookkeeper disclosed the activity for that period in the 1998 October Quarterly reporting period. She said that she was in the process of putting together the 1998 July Quarterly Report and would have it completed by Thursday. In addition, Ms. Ellis stated that the Committee filed the 1998 Year End Report and showed a copy of this report to the RAD analyst. The RAD analyst informed her that the Commission never received this original filing, but did receive two amended 1998 Year End filings. The RAD analyst put the 1998 Year End filing on the public record. Ms. Ellis stated that she would be filing amended reports along with the 1998 July Quarterly and 1999 Mid-Year Reports on Thursday of this week.

<del>, ,</del>	or Other Than An Authorized Committee			FEDERAL ELECTION COMMISSION REPORTS ANALYSIS DIVISION
<u>_</u>	NAME OF COMMITTEE (IN TUIL)  ARAB AMERICAN LEADERSHIP PAC		Hor	v 15 11 35 AM 'S
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BE -	CITY, STATE and ZIP CODE		2. FEC IDENTIFIC CO019422	
TYPE OR PRINT	Washington, DC 20006		3. This committ	ee has qualified as a multic (see FEC FORM TM)
4, "	TYPE OF REPORT			
	(a) April 15 Quarterly Report	Mont	hly Report Due On:	
	July 15 Quarierly Report	Ö	March 20 🔲 Ju	ine 20
	October 15 Quarterly Report			plember 20 🗍 Januar
	January 31 Year End Report	12-D	ay Pre-Election Report	
	July 31 Mid Year Report (Non-election Year Only)	electi	on on	(Type of Election in the State of
	Ī	30-04	y Post-Election Repo	nt fallowing the General
	Termination Report			State of
	(b) Is this Report an Amendment? YES NO	······································	201111111	
	MARY	3	COLUMN A This Period	COLUMN B Calendar Year-to-
*******	MMARY  Covering Period NOV, 24, 98through DEC.31, 1998	B		
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FEBANIT.

For Other Than An Authorized Committee

Attachment #12 Page 2 of 2

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TEDETIC

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USE FEC MAILNG LABEL OR TYPE OR PRINT

(Summary Page)

1. NAME OF COMMITTEE (in full)

ARAB AMERICAN LEADERSHIP PAC

ADDRESS (number and street) Check if different than previously reported

1600 K STREET, N.W. 601

CITY. STATE and ZIP CODE

CITY. STATE and ZIP CODE

2. FEC IDENTIFICATION NUMBER C00194225	
This committee has qualified as a multical committee. (see FEC FORM 1M)	andidate

WASHINGTON, D.C. 20006			committee. (see FEC FORM 1M)		
4. TYF	PE OF REPORT				
(a	April 15 Quarterly Report	Month	y Report Due On:		
	Jouly 15 Quarterly Report	<u> </u>	arch 20 🔲 Jul	ne 20	
	October 15 Quarterly Report	-	_	ptember 20 🗍 January 31	
	January 31 Year End Report	] 12-Day	Pre-Election Report	for the(Type of Election)	
	July 31 Mid Year Report (Non-election Year Only)	election	o on	in the State of	
		] 30-Day	Post-Election Repor	t following the General Election	
	Termination Report	on	in the S	State of	
(p)	is this Report an Amendment? YES 4NO				
SUMM	Λ ι . <del>-</del> Λ Ω		COLUMN A This Period	COLUMN B Calendar Year-to-Date	
<u>5.</u> C				\$ 895.73	
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(c			24 936.73	<b>\</b>	
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9. D	ebts and Obligations Owed TO the Committee emize all on Schedule C and/or Schedule D)	\$	<del>- )</del>	For further information contact:	
10. De	ebts and Obligations Owed BY the Committee emize all on Schedule C and/or Schedule D)	\$	37.07	Federal Election Commission 999 E Street, NW Washington, DC 20463	
l certil	y that I have examined this Report and to the best of my knowledge omplete.			J * *	
	r Print Name of Treasurer				
Signati	ure of Treasurer	<del>~</del>		Date	
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701E. 3	ubmission of false, erroneous, or incomplete information may subject the pers	un signii	ig inis neport to the p	ษกลเยธร of 2 U.S.C. 9437g.	

FEC FORM 3X (revised 9/93)